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Attorneys for Plaintiff Millrock Investment Fund 1, LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

MILLROCK INVESTMENT FUND 1, LLC,

Plaintiff,

v.

HEALTHCARE SOLUTIONS
MANAGEMENT GROUP, INC.;
HEALTHCARE SOLUTIONS HOLDINGS
INC.; LANDES CAPITAL MANAGEMENT,
LLC; LANDES AND COMPAGNIE TRUST
PRIVE KB; JOSHUA CONSTANTIN;
JUSTIN SMITH; STUART MCMAHEN; and
BLACK LABEL SERVICES, INC.,

Defendants.

NOTICE OF (1) DISMISSAL OF HSMG'S
BANKRUPTCY CASE; AND (2)
MILLROCK'S PROPOSAL TO MEET AND
CONFER REGARDING AMENDED CASE
DEADLINES AND A PROPOSED
AMENDED SCHEDULING ORDER

Case No. 2:23-CV-00157-RJS-DAO

Chief District Judge Robert J. Shelby

Magistrate Judge Daphne A. Oberg

Plaintiff Millrock Investment Fund 1, LLC ("Millrock") hereby respectfully notifies the
Court and the defendants that have appeared in this case that on June 20, 2024 the United States

Bankruptcy Court for the District of Delaware entered an Order Dismissing Case (the "Order") pursuant to which the Bankruptcy Court dismissed Healthcare Solutions Management Group, Inc.'s ("HSMG") bankruptcy case in *In re: Healthcare Solutions Management Group, Inc.*, Case No. 23-11458 (JTD) ("HSMG's Bankruptcy Case"). *See* Order Dismissing Case, a true and correct copy of which is attached as Exhibit "1." The Order states: "The Court entered an Order on June 3, 2024 (D.I. 34), compelling the Debtor to file its Schedules of Assets and Liabilities, Statement of Financial Affairs and Creditor Matrix within fourteen days. As of this date, Debtor has not complied with the terms of the Court's order. IT IS THEREFORE ORDERED the case is DISMISSED." Thus, the United States Bankruptcy Court for the District of Delaware dismissed HSMG's Bankruptcy Case after HSMG failed to comply with an order from that Court.

In light of the dismissal of HSMG's Bankruptcy Case, counsel for Millrock will be emailing today defendant Justin Smith (who is appearing pro se) and counsel for defendants Joshua Constantin and Stuart McMahan in an effort to set up a meet and confer call for as early as possible next week in an effort to attempt to reach an agreement on proposed revised pending deadlines, and on a proposed amended scheduling order in this case. Counsel for Millrock anticipates that following completion of the meet and confer process, Millrock will file with the Court either (1) a stipulated motion for amended scheduling order; or (2) a unilateral motion for amended scheduling order setting forth dates and any other items on which the parties disagree.

DATED this 21st day of June, 2024.

PARR BROWN GEE & LOVELESS

By: /s/ Rodger M. Burge

Terry E. Welch

Bentley J. Tolk

Rodger M. Burge

Michael S. Wilde

Attorneys for Plaintiff Millrock Investment

Fund 1, LLC

CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2024 I caused to be served a true and correct copy of the foregoing NOTICE OF (1) DISMISSAL OF HSMG'S BANKRUPTCY CASE; AND (2) MILLROCK'S PROPOSAL TO MEET AND CONFER REGARDING AMENDED CASE DEADLINES AND A PROPOSED AMENDED SCHEDULING ORDER via the CM/ECF system on the following:

Keith M. Woodwell, Esq.
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/s/ Wendy V. Tuckett